

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JOHN AND JANE DOE NO. 1, et al.,	:	CASE NO. 3:22-cv-00337
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	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
	:	
vs.	:	
	:	
	:	
BETHEL LOCAL SCHOOL DISTRICT BOARD OF EDUCATION, et al.,	:	
	:	
	:	
Defendants.	:	
	:	
	:	

PLAINTIFFS' UNOPPOSED MOTION TO EXTEND BRIEFING DEADLINES FOR DEFENDANT-INTERVENOR ANNE ROE'S MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION AND MOTION FOR JUDGMENT ON THE PLEADINGS

Plaintiffs John and Jane Doe No. 1; Child No. 1A, a minor, by and through her legal guardians John and Jane Doe No. 1; John and Jane Doe No. 2; John Doe No. 3; Child No. 3B, a minor, by and through her legal guardian John Doe No. 3; Child No. 3C, a minor, by and through his legal guardian John Doe No. 3; Jane Doe No. 4; Child No. 4D, a minor, by and through his legal guardian Jane Doe No. 4; Jane Doe No. 5; Child No. 5E, a minor, by and through his legal guardian Jane Doe No. 5; Jane Doe No. 6; Jane Doe No. 7; Child No. 7F, a minor, by and through his legal guardian Jane Doe No. 7; John and Jane Doe No. 8; and John Doe No. 9 ("Plaintiffs") respectfully move for a 7 day extension to the briefing deadlines for Defendant-Intervenor Anne

Roe's Motion to Dismiss for Lack of Subject Matter Jurisdiction and Motion for Judgment on the Pleadings ("Roe's Motion"), Doc. 75.

The Court ordered briefing deadlines in response to Roe's Motion of 14 days for Plaintiffs' response and 7 days for Roe's reply. Order, Doc. 77. With Good Friday and the Easter holiday, Plaintiffs respectfully request a 7 day extension for their response brief and an equal 7 day extension for Roe's reply brief out of fairness. As a result, Plaintiffs would have up to and including April 17, 2023 to file their response in opposition to Roe's Motion and Roe would have 14 days to file a reply up and including May 1, 2023. Briefing on Roe's Motion will therefore be complete prior to the completion of briefing on any Rule 12 Motion filed by defendants Bethel Local School District Board of Education, Lydda Mansfield, Lori Sebastian, Natalie Donahue, Danny Elam, Jacob King, and Superintendent Matthew Chrispin ("Defendants") if they choose to file a Rule 12 Motion by April 12, 2023—which will be complete by May 3, 2023 under the Court's current order.

Plaintiffs' instant motion is unopposed. Plaintiffs raised the matter with counsel for both Roe and Defendants, and both said that they did not object. In addition, the extension also allows time for proper briefing and family commitments around the holidays without prejudicing Roe's reply. And any and all Rule 12 motions should be fully briefed consistent with the timeline envisioned by the Court.

Dated: April 5, 2023

Respectfully submitted,

s/ Joseph P. Ashbrook
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of April, 2023, I served a copy of the foregoing via the Court's ECF system, which notifies all counsel of record.

s/ Joseph P. Ashbrook
Joseph P. Ashbrook